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**From:** Fugh, Justina [Fugh.Justina@epa.gov]  
**Sent:** 8/16/2019 7:15:36 PM  
**To:** Allnutt, David [Allnutt.David@epa.gov]  
**CC:** Wright, Garth [wright.garth@epa.gov]; Griffo, Shannon [Griffo.Shannon@epa.gov]; Ross, Margaret [Ross.Margaret@epa.gov]; Mosley, Ferne [mosley.ferne@epa.gov]  
**Subject:** RE: revised recusal statement for your new position

Hi Dave,

Just a note to let you know that our stars did not align this week at all in terms of scheduling. I've asked Ferne Mosley, a new (to EPA) and experienced ethics attorney to step in for us. **Ex. 6 Personal Privacy (PP)**

**Ex. 6 Personal Privacy (PP)** and Shannon has her hands full with FOIA.

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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**From:** Allnutt, David  
**Sent:** Wednesday, August 14, 2019 11:49 AM  
**To:** Fugh, Justina <Fugh.Justina@epa.gov>  
**Cc:** Wright, Garth <wright.garth@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>; Ross, Margaret <Ross.Margaret@epa.gov>  
**Subject:** RE: revised recusal statement for your new position

Justina and Garth -- In the interest of keeping this moving, I've attached an draft memo that updates some of the information missing from the July 4 draft and removes some sites and interests as warranted by subsequent discussions with you and/or actions by me.

A couple of things to note:

- Yesterday I submitted my 2019 annual 278 form (for calendar year 2018). As noted in the comments on the attached, I'm not sure that warrants a complete revision of the various tables in the memo. If so -- and if that is likely to take some time -- I'd like some guidance on how best to provide interim screening guidance to my staff in the meantime.
- I have confirmed that **Ex. 5 Deliberative, Ex. 6 Personal Privacy**  
**Ex. 5 Deliberative, Ex. 6 Personal Privacy**  
**Ex. 5 Deliberative, Ex. 6 Personal Privacy**
- As I've previously notified you both, **Ex. 6 Personal Privacy (PP)** I have therefore been participating in matters related to the Portland Harbor site for the past several weeks.

Some cancelled travel has caused me to be unexpectedly in the office today, so I am unusually available to discuss these issues by phone or in person if that would be helpful.

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R. David Allnutt, Acting Director

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Superfund & Emergency Management Division  
U.S. EPA, Region 10  
1200 Sixth Avenue, Suite 155, 14-D12  
Seattle, Washington 98101-3123  
(206) 553-2581

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**From:** Fugh, Justina <[Fugh.Justina@epa.gov](mailto:Fugh.Justina@epa.gov)>

**Sent:** Thursday, July 04, 2019 9:29 PM

**To:** Allnutt, David <[Allnutt.David@epa.gov](mailto:Allnutt.David@epa.gov)>

**Cc:** Wright, Garth <[wright.garth@epa.gov](mailto:wright.garth@epa.gov)>; Griffo, Shannon <[Griffo.Shannon@epa.gov](mailto:Griffo.Shannon@epa.gov)>; Ross, Margaret <[Ross.Margaret@epa.gov](mailto:Ross.Margaret@epa.gov)>

**Subject:** revised recusal statement for your new position

Hi Dave,

Attached is a draft recusal statement for you in your new position. Garth worked with the region's superfund office to get a list of all of the sites at which any of the entities on your recusal list was a party. What we've put on your recusal are those sites that are in Region 10 as we think it unlikely you will be working on sites outside of your region. That said, I can certainly forward to you all of the attachments we received for all of those entities. That way, you can know the names of the sites just in case.

Thanks for alerting us to your position change.

Justina

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